# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Neelam T. Uppal,
Debtor.

V.

Bank of America, et al

USDC SDNY
DOCUMENT
DOCUMENT
LECTRONICALLY FILED
DATE FILED:
DATE FILED:

# MOTION FOR EXTENSION OF TIME TO FILE AMENDED COMPLAINT

Defendant, Neelam Uppal, Pro se files a MOTION FOR EXTENSION OF TIME TO FILE AMENDED COMPLAINT

Against Bank of America, and all other affliated individuals, entities or corporations party to the cause of the motion and states her grounds as follows:

 The Plaintiff got a Heart Attack and is admitted in the hospital for Heart surgery.(See Attached)

### Exhibit 1

2. Wherefore, the Plaintiff requests that the Plaintiff be given extension of time to file the amended complaint by 180 days so that she an recouperate and reschedule her appointment with NYLAG.

Respectfully submitted on this (th day of June 2018.

NEELAM UPPAL, Pro se. PO box 1002

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Largo, FL-33781 PH.- (727)-403-0022

E-mail- nneelu123@aol.com

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on 12 day of June, 2018 to:

via e-mail or U.S. mail postage prepaid to:

Ana Diaz Noa, Esquire The Noa Law Firm Co-counsel for Bank of America, N.A. P.O. Box 652112 Miami, Florida 33265 E-mail: e-service@noalawfirm.com

2. Miguel M. Cordano, Esquire John D. Bernstein, Esquire Liebler, Gonzalez & Portuondo Counsel for Bank of America N.A. Courthouse Tower - 25th Floor 44 West Flagler Street Miami, Florida 33130 E-mail: mc@lgplaw.com service@lgplaw.com 4/06/2018

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NEELAM UPPAL, PRO, SE *P.O BOX 1002. LARGO, FL-33779 PH. - (727)-403-0022 E-mail- nneelu123@aol.com* 

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

	577 JUNE 19 PH 5: 15
In Re: Neelam T. Uppal, Debtor.	Case No.:18- cv-0890
<b>V.</b>	
Jefrrey Shapir	
	/

### ADDITIONAL EVIDENCE

Defendant, Neelam Uppal, Pro se files aADDITIONAL EVIDENCE
Against Bankruptcy Judge, and all other affliated individuals, entities or
corporations party to the cause of the motion and states her grounds as
follows:

- The Docket keeps changing. Now there are 5 operating reports.
   (Exhibit 1)
- 2. Judge Moriis continues to Re-open case to allow frivlous motions by creditors and then orders the debtor to pay attorney fees, even though

there is no law supporting her ations. She is a corrupt Judge who is abusing her authority to loot the debtors, especially pro se litgants, to make money for her allied lawyers. She has mental disability of dyslexia as she is applying the laws totally opposite of what it states. For example, she said, that 'the Bankrupty Judge is required to wath the interes of the Debtor', but on the contrary she is exploiting the debtor.( Exhibit 2)

3. Wherefore, the Appellant requests that she beg iven a relief of declaring her bankruptcy as discharged.

Respectfully submitted, on this th day of 11/6 2018.

NEELAM UPPAL, Pro se.

NEELAM UPPAL, Pro se. PO box 1002 Largo, FL-33781 PH.- (727)-403-0022

E-mail- nneelu123@aol.com

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on 12 day of June, 2018 to:

Jeffrey Sapre 290 Kuollwood Ave white Pland New York Via com/ecf

via e-mail or U.S. mail postage prepaid to:

Ana Diaz Noa, Esquire The Noa Law Firm Co-counsel for Bank of America, N.A. P.O. Box 652112 Miami, Florida 33265 E-mail: e-service@noalawfirm.com

2. Miguel M. Cordano, Esquire John D. Bernstein, Esquire Liebler, Gonzalez & Portuondo Counsel for Bank of America N.A. Courthouse Tower - 25th Floor 44 West Flagler Street Miami, Florida 33130 E-mail: mc@lgplaw.com service@lgplaw.com 4/06/2018

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NEELAM UPPAL, PRO, SE P.O BOX 1002. LARGO, FL-33779 PH. - (727)-403-0022 E-mail- nneelu123@aol.com *i* ( )



#### 16-12356-cgm Neelam Taneja

Case type: bk Chapter: 13 Asset: Yes Vol: v Judge: Cecelia G. Morris
Date filed: 08/15/2016 Date of last filing: 05/17/2018
Debtor dismissed: 11/22/2017

## History

Doc. No.		Dates	Description
	Filed: Entered:	05/17/2018 05/24/2018	<b>→</b> Terminate Pending Deadlines
	Filed: Entered:	05/17/2018 05/24/2018	<b>→</b> Terminate Pending Deadlines
	Filed & Entered:	05/14/2018	3Letter
	Filed: Entered:	05/11/2018 05/14/2018	3Letter
	Filed: Entered:	04/16/2018 04/18/2018	Order of U.S. District Court Judge
	Filed: Entered:	04/11/2018 04/23/2018	3Transcript
	Filed: Entered:	04/02/2018 04/03/2018	3Letter
	Filed: Entered:	04/02/2018 04/03/2018	3Letter
	Filed: Entered:	03/28/2018	Transcript
246	Filed & Entered:	02/01/2018	Notice of Reassignment of Chapter 13 Standing Trustee
	Filed & Entered:	01/25/2018	3Letter
	Filed: Entered:	01/22/2018 01/24/2018	Affidavit

Filed: 12/23/2017 © Certificate of Mailing PDF notice Entered: 12/24/2017 12/21/2017 Order Re: Motion to Stay Order Filed & Entered: 12/21/2017 Notice Filed & Entered: 12/14/2017 ELetter Filed & Entered: 12/01/2017 \*\*Civil Cover Sheet 235 Filed & Entered: 12/01/2017 Designation of Contents (appellant) Filed & Entered: Filed: 12/01/2017 → Motion for Stay Pending Appeal Entered: 12/07/2017 *Terminated:* 12/21/2017 Filed: 12/01/2017 3 Letter Entered: 12/07/2017 Filed: 12/01/2017 Notice of Change of Address of Debtor/Creditor Entered: 12/07/2017 11/27/2017 3Letter Filed & Entered: Filed: 11/27/2017 Notice of Appeal Entered: 12/01/2017 Filed: 11/24/2017 Certificate of Mailing - Order to Dismiss Entered: 11/25/2017 11/22/2017 Order Re: Motion to Dismiss Case Filed & Entered: 11/21/2017 Order of U.S. District Court Judge Filed & Entered: Filed: 11/13/2017 Notice of Appeal Entered: 11/14/2017 Filed: 11/13/2017 3 Letter Entered: 11/16/2017 Filed: 11/09/2017 Terminate Pending Deadlines Entered: 11/13/2017 11/07/2017 Notice of Hearing Filed & Entered: 11/06/2017 Affidavit of Service Filed & Entered:

	Filed & Entered:	10/20/2017 Adversary Closed
	Filed & Entered:	10/16/2017 Order of U.S. District Court Judge
	Filed & Entered:	10/16/2017 Order of U.S. District Court Judge
	Filed & Entered:	10/13/2017 Notice of Change of Address of Debtor/Creditor
	Filed & Entered:	10/12/2017 Notice of Hearing
	Filed: Entered:	10/10/2017 • Amended/Modified Plan 10/11/2017
	Filed & Entered:	10/06/2017 Add Attorney
	Filed: Entered:	09/29/2017 ③Letter 10/06/2017
	Filed & Entered:	09/27/2017 Add Attorney
	Filed & Entered:	09/22/2017 Withdrawal of Claim
	Filed & Entered:	09/21/2017 Adversary Closed
	Filed & Entered:	09/20/2017 Adversary Closed
	Filed & Entered:	09/19/2017 Order Re: Motion for Preliminary Injunction
	Filed & Entered:	09/19/2017 Order Re: Motion for Objection to Claims
	Filed & Entered:	09/19/2017 Order Re: Motion for Objection to Claims
	Filed & Entered:	09/19/2017 Order Re: Motion to Stay Order
	Filed & Entered:	09/15/2017 Terminate Attorney
	Filed & Entered:	09/15/2017 Notice of Appeal
211 <i>I</i>	Filed: Entered:	09/15/2017 → Notice of Adjournment of Hearing 09/19/2017
212 <i>I</i>	Filed: Entered:	09/15/2017 Notice of Adjournment of Hearing 09/19/2017

213 *Filed*: 09/15/2017 Notice of Adjournment of Hearing 09/19/2017 Entered: Filed & Order Re: Motion to Confirm Termination or Absence of 09/14/2017 Entered: 09/14/2017 Notice of Withdrawal Filed & Entered: 208 *Filed*: 09/14/2017 Notice of Adjournment of Hearing Entered: 09/15/2017 209 Filed: 09/14/2017 Notice of Adjournment of Hearing Entered: 09/15/2017 Motion for Stay Pending Appeal Filed & 09/13/2017 Entered: Terminated: 09/19/2017 Filed: 09/13/2017 3 Letter Entered: 09/19/2017 09/12/2017 So Ordered Stipulation Filed & Entered: Filed: 09/08/2017 Motion for Objection to Claims 09/13/2017 Entered: Terminated: 09/19/2017 Filed: 09/08/2017 → Motion for Objection to Claims Entered: 09/13/2017 *Terminated:* 09/19/2017 Filed: 09/08/2017 3 Declaration Entered: 09/13/2017 Filed: 09/08/2017 Motion for Preliminary Injunction Entered: 09/13/2017 Terminated: 09/19/2017 Filed: 09/02/2017 © Certificate of Mailing - Ntc Of Transmittal Of ROA To 09/03/2017 USDC SDNY Entered: 09/01/2017 • Application for Pro Hac Vice Admission Filed & Entered: 08/31/2017 Order Terminating Loss Mitigation and Final Report - No Filed & agreement reached Entered: Notice, Transmittal of Record Of Appeal To USDC SDNY Filed & 08/31/2017 (BNC) Entered: 08/30/2017 Civil Cover Sheet 192 Filed & Entered: Filed: 08/28/2017 Notice of Appeal Entered: 08/31/2017

08/25/2017 3 Certificate of Mailing - Blank Notice Filed: 08/26/2017 Entered: Filed: Entered: 09/01/2017 Filed: 08/24/2017 Terminate Pending Deadlines Entered: 09/01/2017 Filed: 08/24/2017 Terminate Pending Deadlines 09/12/2017 Entered: 199 Filed: 08/24/2017 Notice of Adjournment of Hearing 09/08/2017 Entered: Filed: 08/24/2017 Entered: Filed & Entered: Filed: 08/21/2017 3 Affidavit Entered: 08/31/2017 08/18/2017 Reply to Motion Filed & Entered: 08/18/2017 • Memorandum of Law Filed & Entered: Filed: 08/14/2017 Response Entered: 08/15/2017 08/12/2017 3 Certificate of Mailing - Blank Notice Filed: Entered: 08/13/2017 Filed: 08/12/2017 Certificate of Mailing - Blank Notice Entered: 08/13/2017 Filed: 08/12/2017 Certificate of Mailing PDF notice 08/13/2017 Entered: Filed & Entered: 08/10/2017 Blank Notice Filed & Entered: 08/10/2017 Scheduling Order Filed & Entered: Filed: 08/09/2017 **Opposition** Entered: 08/10/2017 Filed & Entered: 07/28/2017 Motion to Confirm Termination or Absence of Stay Filed & Entered:

	Terminated:	09/14/2017
	Filed & Entered:	07/21/2017 Adversary Closed
	Filed: Entered:	07/21/2017 → Designation of Contents (appellant) 07/24/2017
	Filed: Entered:	07/20/2017
	Filed: Entered:	07/20/2017
172	Filed: Entered:	07/13/2017 Notice of Adjournment of Hearing 07/17/2017
173	Filed: Entered:	07/13/2017 Notice of Adjournment of Hearing 07/17/2017
	Filed & Entered:	07/12/2017 Operating Report
	Filed & Entered:	07/10/2017 **Operating Report   See
	Filed & Entered:	07/10/2017 Operating Report See
	Filed & Entered:	07/10/2017 Operating Report
	Filed & Entered:	07/10/2017 Operating Report
	Filed & Entered:	07/10/2017 ** Opposition
	Filed: Entered:	06/29/2017 Notice of Appeal 06/30/2017
	Filed & Entered:	06/06/2017 Order Re: Motion for Relief from Stay
	Filed & Entered:	06/05/2017 Adversary Closed
	Filed & Entered:	06/02/2017 Motion, Dismiss Case
	Terminated:	11/22/2017
	Filed: Entered:	06/01/2017 Terminate Pending Deadlines 06/05/2017
164	Filed: Entered:	06/01/2017 → Notice of Adjournment of Hearing 06/06/2017
	Filed & Entered:	05/31/2017 Status Report

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05/27/2017 Motion to Authorize
    Filed &
    Entered:
    Terminated:
                 05/31/2017
                 05/24/2017 Order Terminating Loss Mitigation And Final Report Other
    Filed &
    Entered:
                 05/18/2017 Notice (GENERIC)
157 Filed &
    Entered:
                 Filed &
    Entered:
    Filed:
                 05/04/2017 © Certificate of Mailing - Order Re: Chapter 13 Case
    Entered:
                 05/05/2017
                 05/02/2017 Order, Directing Future Filing Procedures (Chapter 13)
    Filed &
    Entered:
                 Filed &
    Entered:
                 04/25/2017 Status Report
    Filed &
    Entered:
                 Filed &
    Entered:
                 04/24/2017 Order Re: Motion for Objection to Claims
    Filed &
    Entered:
                 04/24/2017 Order Re: Motion for Objection to Claims
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                  03/31/2017 3Transcript
    Entered:
                  04/03/2017
    Filed:
                  03/31/2017 3 Transcript
    Entered:
                  04/03/2017
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                  03/31/2017 3Transcript
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Entered: 04/04/2017 Filed: 03/31/2017 3Transcript Entered: 04/04/2017 Filed: 03/31/2017 3 Transcript Entered: 04/04/2017 03/21/2017 Status Report Filed & Entered: 03/21/2017 Status Report Filed & Entered: 03/20/2017 • Motion for Summary Judgment Filed & Entered: 03/21/2017 Terminated: 03/18/2017 Certificate of Mailing - Blank Notice Filed: 03/19/2017 Entered: 03/18/2017 © Certificate of Mailing PDF notice Filed: 03/19/2017 Entered: 03/16/2017 \*\*Order Re: Application for Pro Hac Vice Filed & Entered: 03/16/2017 • Memorandum Endorsed Order Filed & Entered: 03/16/2017 Notice Filed & Entered: 139 Filed & Entered: Filed & Entered: Filed: 03/15/2017 © Certificate of Mailing - Blank Notice Entered: 03/16/2017 03/13/2017 • Auto- docket of credit card Filed & Entered: Filed & Entered: 03/13/2017 • Application for Pro Hac Vice Admission Filed & Entered: Terminated: 03/16/2017 03/13/2017 Status Report Filed & Entered: 03/10/2017 Affidavit Filed & Entered:

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G. Barry Wilkinson, P.A. Attorney for Defendants P.O. Box 8102 Madeira Beach, FL 33738-8102 T: (727) 823-1514 F: (727) 823-0328

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK MANHATTAN DIVISION

IN RE: NEELAM TANEJA,

A/K/A NEELAM T. UPPAL, :

Debtor,

Neelam Uppal,

Plaintiff,

v. : Adversary No. 17-01026-cgm

Case No. 16-12356-cgm

Charlene Rodriguez, : Barry Wilkinson, and :

G. Barry Wilkinson, P.A., f/k/a

Wilkinson & Sadorf, P.A.,

Defendants.

\_\_\_\_\_x

#### ORDER TO REGISTER JUDGMENT

Before the court is Creditors' motion to register judgment. The Court now rules on this motion. Creditors, in their motion to register judgment, urge this court to do so under 28 U.S.C. § 1963, arguing that there has been "good cause" shown to support such a decision. 28 U.S.C. § 1963 provides in relevant part:

§ 1963. Registration of judgments for enforcement in other districts. A judgment in an action for the recovery of money or property entered in any \* \* \* bankruptcy court, \* \* \* may be registered by filing a certified copy of the judgment in any other district \* \* \* when the judgment has become final by appeal or expiration of the time for appeal or when ordered by the court that entered the judgment for good cause shown. \* \* \* A judgment so registered shall have the same effect as a judgment of the district court of the district where registered and may be enforced in like manner.

Uppal has appealed the above described Final Judgment, and that appeal is not yet final.

See U.S. District Court, Southern District of New York (Foley Square) In Re Neelam Uppal, Uppal

v. Rodriguez and Wilkinson, Case 1:17-cv-08510-VSB.

In support of the Creditors' position that good cause exists in this case for entry of an order to register the Final Judgment in a foreign district, the Creditors note that: (a) Uppal has no identifiable assets in the State of New York; (b) Uppal may have assets in other districts, specifically in the State of Florida; (c) Creditors believe that such assets may be concealed or transferred if prompt registration of the judgment is not permitted; and (d) Uppal has failed to post a supersedes bond pending appeal of this Court's entry of the Final Judgment in this adversary action, even though Uppal filed her Emergency Motion for Stay and Injunctive Relief [Doc 75] on December 26, 2017.

The court finds such a showing satisfies the good cause requirement of § 1963. The Court is authorized to determine whether good cause has been shown for registration of a Final Judgment in a foreign jurisdiction while an appeal of the Final Judgment remains pending. See *Chicago Down Ass'n v. Chase*, 944 F. 2d 366, 372 (7th Cir. 1991) ("good cause" existed where defendant owned no property in district of judgment, defendant owned property in other districts, plaintiff feared that defendant might transfer or conceal such property, and defendant failed to post a supersedes bond); and *Johns v. Rozet*,143 F.R.D. 11, 12 (D.D.C. 1992) (same); *Associated Business Telephone Sys. Corp. V. Greater Capital Corp*, 128 F.R.D. 63, 68 (D.N.J. 1989) ("good cause" shown where defendant had no assets in district of judgment but did have assets in other districts).

The court finds the Final Judgment is currently on appeal, and Uppal has not filed a supercedes bond to stay enforcement of the Final Judgment. In *Occidental Fire & Casualty* 

Company of North Carolina v. Great Plains Capital Corp., et al, 912 F.Supp. 515, 519 (S.D.

Florida 1995), the court determined the final judgment could not be registered in a foreign district

until the final judgment had become final by appeal or until Arizona court had ordered registration

for good cause shown, ruling that the registration case had been prematurely filed.

THE COURT GRANTS CREDITORS' MOTION TO REGISTER FINAL

JDUGMENT.

THE COURT FURTHER GRANTS Creditors' motion for an award of costs and fees

reasonably incurred to obtain this order, and retains jurisdiction to consider the amount thereof.

Dated: June 4, 2018 Poughkeepsie, New York



/s/ Cecelia G. Morris

Hon. Cecelia G. Morris Chief U.S. Bankruptcy Judge



TRK# 7724 4721 5348

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